

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

INTORA, INC.,

Plaintiff

v.

THE PARTNERSHIPS AND
UNINCORPORATED ASSOCIATIONS
IDENTIFIED ON SCHEDULE “A,”

Defendants.

Civil Case No. 1:23-cv-04504

Judge Thomas M. Durkin

Magistrate Judge Gabriel Fuentes

**AGREED MOTION FOR ENTRY OF
CONSENT JUDGMENT AND PERMANENT INJUNCTION**

Plaintiff, Intora, Inc. d/b/a Sportsheets International (Sportsheets), by its attorneys, hereby moves this Court for entry of the attached proposed Consent Judgment and Permanent Injunction against bei jing yi xun tong guo ji mao yi you xian gong si, d/b/a first*shoppingmall; he nan mei ku shang mao you xian gong si, d/b/a factory*direct*store; he nan mei ku shang mao you xian gong si, d/b/a Sex*Toy*Shop, username factory*shopping; he nan mei ku shang mao you xian gong si, d/b/a dhs_stor, username factory*no1*store; he nan yi xun tong shang mao you xian gong si, d/b/a Wholesale*Sextoys*Store, username bys3731; he nan mei ku shang mao you xian gong si, d/b/a wholeale2022store, username world*wholesale*store; he nan yi xun tong shang mao you xian gong si, d/b/a wholesale*2021*store, username wholesale*2019*store; and he nan mei ku shang mao you xian gong si, d/b/a sex*toys*factory, username young256 (collectively, the “Listed Defendants”).¹ In support thereof, Plaintiff states as follows:

¹ This Motion for Entry of Consent Judgment and Permanent Injunction (“Motion”) may encompass one or more online stores or sellers or named defendants. For simplicity, the Motion will refer to the Listed Defendants in the plural, even if only one defendant is defined or contemplated or bound by the Motion.

1. The Plaintiff and Listed Defendants have entered into a Settlement Agreement, which only resolves this action as between Sportsheets and the Listed Defendants, and does not affect the judgments entered against other defendants in this case.

2. As a part of the entered-into Settlement Agreement, Plaintiff and the Listed Defendants agreed to the form and entry of the attached proposed Consent Judgment and Permanent Injunction.

WHEREFORE, Plaintiff, on behalf of the parties, requests the Court to enter the concurrently submitted proposed Consent Judgment and Permanent Injunction in its present form, which will only resolve this action as between Sportsheets and the Listed Defendants, and will not affect the judgments entered against other defendants in this case.

Dated: October 2, 2023

Respectfully submitted,

INTORA, Inc., dba Sportsheets International

By: /s/ James P. Muraff
One of its attorneys

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CERTIFICATE OF SERVICE

I, James P. Muraff, an attorney, hereby certify that on October 2, 2023, I electronically filed the foregoing **AGREED MOTION FOR ENTRY OF CONSENT JUDGMENT AND PERMANENT INJUNCTION** with the Clerk of Court using the Electronic Case Filing System and in compliance with the General Order on Electronic Case Filing. As such, these documents were served on all parties who are deemed to have consented to electronic service.

By: /s/ James P. Muraff